

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

)	
In re)	
)	Chapter 7
TAMARA ANN TELLO)	Case No. 06-11856-JMD
)	
Debtor)	
)	
)	
OLGA L. BOGDANOV, CHAPTER 7)	Adversary Proceeding
TRUSTEE OF TAMARA ANN TELLO)	No. 07-1046
)	
Plaintiff)	
v.)	
)	
TAMARA ANN TELLO and)	
T.D. BANKNORTH)	
)	
Defendants)	
)	

**PLAINTIFF'S EX-PARTE MOTION FOR
TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, as made applicable by Rule 7065 of the Rules of Bankruptcy Procedure, the plaintiff, Olga L. Bogdanov, Chapter 7 Trustee of the estate the above captioned debtor, (the "Trustee"), hereby moves for the entry of a temporary restraining order relating to certain a bank account of the debtor at T.D. Banknorth. In support of this Motion, the Trustee relies upon and incorporates herein the Verified Complaint filed concurrently herewith. In further support of this Motion, the Trustee states the following:

1. The Trustee brings this Motion ex-parte because the debtor has access to the bank account at Banknorth and may liquidate her interest in the bank account if given notice of this Motion.

2. The Trustee is likely to succeed on the merits of the case because the Funds in the account constitute property of the estate.

3. The Trustee will suffer irreparable harm if the temporary restraining order does not issue because the debtor may liquidate or transfer her interest in the bank account.

4. The equities favor the issuance of the temporary restraining order because no undue burden is placed upon the debtor by the issuance of a temporary restraining order.

5. The public interest is served by the issuance of the temporary restraining order because the Trustee should recover on behalf of the bankruptcy estate funds belonging to the debtor's bankruptcy estate.

WHEREFORE, the Trustee requests that the Court enter a temporary restraining order: enjoining the Defendants from conveying, assigning, transferring, pledging, encumbering, liquidating, receiving or dissipating any funds in the bank account held in the name of the debtor at Banknorth.

Respectfully submitted,

OLGA L. BOGDANOV, CHAPTER 7 TRUSTEE
OF THE ESTATE OF TAMARA ANN TELLO,
By her attorneys,

/s/ Olga L. Bogdanov BNH#06338

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